

**IN THE UNITED STATES DISTRICT COURT  
IN THE DISTRICT OF NEW JERSEY**

Dale Ylitalo, individually and on behalf of  
all others similarly situated,

*Plaintiff,*

v.

Case No. 2:24-cv-7635-JKS-LDW

Automatic Data Processing, Inc., ADP, Inc.,  
and American Century Investments  
Services, Inc.,

*Defendants.*

**MOTION OF DALE YLITALO FOR APPOINTMENT AS LEAD PLAINTIFF  
AND APPROVAL OF COUNSEL**

**TO THE CLERK OF THE COURT, ALL PARTIES, AND COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that Dale Ylitalo (“Ylitalo”) respectfully moves this Court for an order (1) appointing Ylitalo as lead plaintiff pursuant to Section 21D of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); (2) approving Ylitalo’s selection of Federman & Sherwood as Lead Counsel and Kantrowitz, Goldhamer & Graifman, P.C. as Liaison Counsel for the class; and (3) granting such other relief as the Court may deem to be just and proper (the “Motion”).

This Motion is supported by the accompanying Memorandum of Law, Declaration of William B. Federman and the exhibits attached thereto, a Proposed Order, and all of the prior pleadings and proceedings in this matter, and such other written and/or oral argument as may be permitted by the Court.

Dated: September 17, 2024

By: /s/ William B. Federman

William B. Federman\*

Jessica A. Wilkes\*

*\*Admitted Pro Hac Vice*

**FEDERMAN & SHERWOOD**

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*Counsel for Lead Plaintiff Movant Dale Ylitalo  
and Proposed Lead Counsel for the Class*

### **CERTIFICATE OF SERVICE**

I hereby certify that this Motion was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on September 17, 2024.

/s/ William B. Federman

William B. Federman